

## **Exhibit A**

JUROR NUMBER \_\_\_\_\_

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

- v. -

BRUCE GARELICK,

Defendant.

Case No.: 23-CR-307 (LJL)

**Instructions for Jury Questionnaire**

This questionnaire is designed to obtain information about your background as it relates to your service as a juror in this case. We are using it to shorten the jury selection process. The purpose of these questions is to determine whether prospective jurors can decide this case fairly, based solely on the evidence presented at trial and the instructions on the law given by the judge.

**Please write your assigned juror number at the top of each page.** Respond to each question. Do not leave any questions blank. If a question does not apply to you in any way, write “N/A” rather than leaving the form blank. Extra space for answers is provided at the end of the questionnaire.

Your candor and honesty are necessary so that both the prosecution and the defense will have a meaningful opportunity to select an impartial jury. Your cooperation is of vital importance. You are sworn to give true and complete answers, and those answers will be available only to the Court and the parties in this case.

From now, until you have been formally excused from service, you are instructed not to communicate in person, in writing, or electronically about this case or the questionnaire with anyone, including your family and fellow jurors. Also, you should not go online or look at any source to learn more about the charges, the defendant, or any participant in the case.

**Please print legibly - use only black or blue ink (no pencils).**

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### **Nature of the Case**

The indictment in this case alleges that the defendant, Mr. Bruce Garelick, violated federal statutes that make it unlawful to commit securities fraud; specifically, a certain kind of securities fraud called insider trading. The indictment alleges insider trading based on Mr. Garelick's purchase and sale of securities in a publicly traded Special Purpose Acquisition Company, or SPAC, called Digital World Acquisition Corporation, abbreviated DWAC, which ultimately merged with a company called Trump Media & Technology Group, which owns the social media platform "Truth Social." The government alleges that Mr. Garelick violated federal law by using or sharing information he learned from DWAC in connection with the purchase or sale of securities and in breach of his duties to DWAC.

The indictment is not evidence. It merely contains accusations. The government has the burden of producing evidence sufficient to prove the defendant's guilt on any count beyond a reasonable doubt. And the defendant is presumed to be innocent. This summary is only provided so that we can determine whether there is anything about the case that would make it difficult or inappropriate for you to sit as a fair and impartial juror.

### **Questions**

1. The trial of this case may last up to 2 weeks. Would the schedule in this case be a serious hardship for you?

☐ Yes

☐ No

If yes, please explain why serving on the jury for this case would cause you a serious hardship.

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2. Do you have any personal commitments that would make it difficult for you to get to court by 9:30 a.m., every day of trial?

☐ Yes

☐ No

If yes, please explain why you would be unable to get to court by 9:30 a.m.

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3. Do you have any difficulty with your eyesight or hearing or any medical condition that would make it difficult for you to serve on a jury?

☐ Yes

☐ No

If yes, please explain:

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4. Are you taking any medication, or do you have any medical condition, that would prevent you from giving full attention to all of the evidence at this trial?

☐ Yes

☐ No

If yes, please explain:

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5. Do you have any difficulty reading or understanding the English language?

☐ Yes

☐ No

If yes, please explain:

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6. Do you have any ideas or beliefs that would prevent or hinder you from following the instructions that I will give as to the law or from acting as a fair and impartial juror in this case?

☐ Yes

☐ No

If yes, please explain:

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JUROR NUMBER \_\_\_\_\_

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7. Do you have any religious, philosophical, moral, or other belief that might make you unable to render either a guilty or not guilty verdict for some reason that's unrelated to the evidence that you see here in court?

☐ Yes

☐ No

If yes, please explain:

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8. Do you have any doubt that you would be able to evaluate each witness' credibility without bias or prejudice?

☐ Yes

☐ No

If yes, please explain:

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9. Do you have any strong feelings about litigation or the criminal justice system in general that would make it difficult for you to be a fair and impartial juror in this case?

☐ Yes

☐ No

If yes, please explain:

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10. Do you have any doubt that you would be able to decide this case based solely on the evidence presented at the trial here in the courtroom and not based on any other information?

☐ Yes

☐ No

If yes, please explain:

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11. Do you have any personal knowledge concerning the charges at issue in this case or know anything about the facts of this case other than what was previously described?

☐ Yes

☐ No

If yes, please explain:

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12. Have you heard, read, or seen anything from newspapers, television, radio, the internet, social media, friends, family, or any other source, regarding Bruce Garelick or the charges in this case?

☐ Yes

☐ No

If yes, please explain:

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13. Have you heard, read, or seen anything from newspapers, television, radio, the internet, social media, friends, family, or any other source, regarding Digital World Acquisition

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Corp., known as DWAC, or Trump Media & Technology Group, currently listed on the NASDAQ as DJT?

☐ Yes

☐ No

If yes, please explain:

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14. The government is represented by the United States Attorney's Office for the Southern District of New York. Mr. Damian Williams is the United States Attorney. Assistant United States attorneys Matthew Shahabian, Elizabeth Hanft, and Daniel Nessim will try the case for the government. They will be assisted by Special Agent \_\_\_\_\_ of the FBI. At times, the government will also be assisted by \_\_\_\_\_, who are legal assistants in the U.S. Attorney's Office. Do you, a family member, or a close friend, know any of these individuals?

☐ Yes

☐ No

If yes, please explain:

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15. Do you or does anyone you know have any associations or employment with either the United States Attorney's Office here or any law enforcement agency, federal, state, or local?

☐ Yes

☐ No

If yes, please explain:

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JUROR NUMBER \_\_\_\_\_

16. Do you or does anyone you know have any associations or employment with the FBI, the Securities and Exchange Commission (“SEC”), the Financial Industry Regulatory Authority (“FINRA”), or the NASDAQ?

☐ Yes

☐ No

If yes, please explain:

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17. Do you, a family member, or a close friend know or have any dealings with Mr. Bruce Garelick?

☐ Yes

☐ No

If yes, please explain:

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18. Do you, a family member, or a close friend know or have any dealings with Digital World Acquisition Corp., known as DWAC, or Trump Media & Technology Group, traded on the NASDAQ as DJT?

☐ Yes

☐ No

If yes, please explain:

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19. Mr. Garelick is represented by lawyers from the law firm Shapiro Arato Bach LLP, including Jonathan Bach, Alexandra Shapiro, Julian Brod, and Jason Driscoll. Do you, a



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family member, or a close friend know or have any dealings with these individuals or their law firm?

☐ Yes

☐ No

If yes, please explain:

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20. Please indicate whether you know or have heard of any of the following individuals or companies:

**[list of names to be presented by parties in advance of trial]**

☐ Yes

☐ No

If yes, please indicate which individuals or companies you recognize:

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21. Have you, a family member, or close friend ever used the social media platform created by Trump Media & Technology Group known as “Truth Social”?

☐ Yes

☐ No

If yes, please explain:

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22. Have you, a family member, or close friend ever invested or considered investing in the stocks publicly listed on the NASDAQ as DWAC and/or DJT?

☐ Yes

☐ No

If yes, please explain:

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23. If a company involved in this case had business dealings with an entity affiliated with former president Donald J. Trump, would that impact your ability to be fair and impartial?

☐ Yes

☐ No

If yes, please explain:

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24. This case is not about politics, political parties, or the upcoming presidential election. However, the evidence presented in this case might make mention of former president Donald J. Trump. Do you have any reaction to the name Donald J. Trump that would impact your ability to be fair and impartial when assessing evidence that might refer to that name?

☐ Yes

☐ No

If yes, please explain:

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25. Does the fact that the charges involve the securities industry or allegations of insider trading make it difficult for you to render a fair verdict?

☐ Yes

☐ No

If yes, please explain:

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26. Do you feel that if someone is accused of insider trading, then he is probably guilty?

☐ Yes

☐ No

If yes, please explain:

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27. Have you read or seen anything about other cases involving alleged insider trading or fraud in the purchase or sale of securities?

☐ Yes

☐ No

If yes, please explain:

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28. The government regulates and supervises the financial industry and the stock market. Do you have opinions, either positive or negative, about the government's regulation of the financial industry and the stock market that may impact your ability to be a fair and impartial juror in this case?

☐ Yes

☐ No

If yes, please explain:

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29. Do you think the government should more closely regulate and supervise the financial industry and the stock market?

☐ Yes

☐ No

If yes, please explain:

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30. You may hear about multi-million dollar transactions and wealthy individuals. Would that impact your ability to be a fair and impartial juror in this case?

☐ Yes

☐ No

If yes, please explain:

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31. Have you, a family member, or close friend ever worked for a securities brokerage firm, mutual fund company, hedge fund, investment manager, investment advisor, securities trader, investment analyst, investment bank, stock promoter, or any other financial institution that was involved in the buying or selling of securities?

☐ Yes

☐ No

If yes, please explain:

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32. Have you ever received any training as an investment advisor, financial planner, financial analyst, stock broker or stock analyst?

☐ Yes

☐ No

If yes, please explain:

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33. Have you, a family member, or close friend ever served on the board of directors of a company?

☐ Yes

☐ No

If yes, please explain:

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34. In this case, there will be a lot of finance-related and accounting-related testimony regarding investing in public companies. Do you have any particular knowledge of any of these subjects through education, work or personal experience, or otherwise?

☐ Yes

☐ No

If yes, please explain:

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35. Have you invested in securities, meaning financial instruments like stocks and bonds? Have you purchased shares of stock in specific companies?

☐ Yes

☐ No

If yes, please explain:

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36. Do you have views about whether the stock market is fair?

☐ Yes

☐ No

If yes, please explain:

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37. Have you, a family member, or a close friend had a negative experience investing?

☐ Yes

☐ No

If yes, please explain:

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38. Do you know what a SPAC is?

☐ Yes

☐ No

If yes, please explain:

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39. Have you, a family member, or a close friend ever been employed by or had any association with, the federal, state, or local government, or by any of its offices, departments, or agencies, including any law enforcement agency?

☐ Yes

☐ No

If yes, please explain:

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40. Are you, a family member, or a close friend a judge, law clerk, court attendant, court clerk, any kind of court personnel, probation officer, or person connected with correctional institutions or jails?

☐ Yes

☐ No

If yes, please explain:

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41. Have you, a family member, or a close friend ever applied for a position with any law enforcement or securities regulatory agency?

☐ Yes

☐ No

If yes, please explain:

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42. Would you tend to give the government's witness testimony or evidence more or less weight than the defendant's evidence on the same subject, because the testimony is presented by the government?

☐ Yes

☐ No

If yes, please explain:

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43. Do you believe that simply because the defendant has been charged with a crime that it is likely he did something wrong?

☐ Yes

☐ No

If yes, please explain:

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44. If, after hearing all the evidence and my instructions on the law, you found that the government has not proven its case beyond a reasonable doubt, would you feel uncomfortable finding the defendant not guilty?

☐ Yes

☐ No

If yes, please explain:

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45. Have you, or a relative or close friend, ever been charged with a crime, including a violation of securities laws? If so, is there anything about that experience that would prevent you from acting as a fair and impartial juror in this case?

☐ Yes

☐ No

If yes, please explain:

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46. Have you, a family member, or a close friend ever been accused of fraud, including fraud in connection with securities or other investments?

☐ Yes

☐ No

If yes, please explain:

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47. Have you, a family member, or close friend ever been the subject of an investigation or accusation by any grand jury, state or federal, or any other investigation, or the recipient of a subpoena for any inquiry or investigation?

☐ Yes

☐ No

If yes, please explain:

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48. Have you, a family member, or close friend ever appeared as a witness, been involved with in an individual or business capacity, or been questioned for any investigation?

☐ Yes

☐ No

If yes, please explain:

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49. Have you, a family member, or close friend either as an individual or in the course of business, ever been a party to any legal action or dispute with the United States, any officer, department, agency, or employee of the United States, the SEC, the Internal Revenue Service (the "IRS"), or the FBI, or had any interest in any such legal action or dispute or its verdict?

☐ Yes

☐ No

If yes, please explain:

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50. Have you, either through any experience you have had or anything you have seen or read, developed any bias or prejudice for or against the United States Department of Justice, the United States Attorney's Office for the Southern District of New York, or the FBI?

☐ Yes

☐ No

If yes, please explain:

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51. Have you, a family member, or close friend ever had business dealings in the cannabis/marijuana industry?

☐ Yes

☐ No

If yes, please explain:

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52. Do you have any particular views about the cannabis/marijuana industry?

☐ Yes

☐ No

If yes, please explain:

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53. Have you, either through any experience you have had or anything you have seen or read, developed any bias or prejudice against individuals or companies that do business in the cannabis/marijuana industry?

☐ Yes

☐ No

If yes, please explain:

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JUROR NUMBER \_\_\_\_\_

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54. Have you, or has any family member or any close friend, ever been the victim of a crime, or ever pressed criminal charges against someone, or tried to press criminal charges against someone?

☐ Yes

☐ No

If yes, please explain:

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55. If you answered yes to the previous question, indicate below the type of crime, when it happened, and the outcome of any law enforcement action. Is there anything about that experience that could affect your ability to be fair and impartial in this case?

☐ Yes

☐ No

Type of crime & year: \_\_\_\_\_

If yes, please explain:

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56. Have you, or your friends or family members, been the victims of a fraud or financial crime?

☐ Yes

☐ No

If yes, please explain:

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57. Have you ever served as a juror before in any type of case?

☐ Yes

☐ No

58. If so, please state whether each case was in state or federal court, whether it was a civil or criminal matter, and whether a verdict was reached:

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59. Have you served as a grand juror, which is different? If so, please indicate where and when you served, and describe, in general terms, the kinds of cases you heard.

☐ Yes

☐ No

If yes, please explain:

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60. Is there anything else—whether on this questionnaire or not—that would affect your ability to render a fair and impartial verdict in this case?

☐ Yes

☐ No

If yes, please explain:

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61. Please provide the following personal information:

Age: \_\_\_\_\_ Town/Borough/Neighborhood where you reside: \_\_\_\_\_

Members of household: \_\_\_\_\_

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62. Check highest level of education:

- a. Grade School or less: \_\_\_\_\_
- b. Some high school: \_\_\_\_\_
- c. High school graduate: \_\_\_\_\_
- d. Technical or business school: \_\_\_\_\_
- e. Some College: \_\_\_\_\_
- f. College degree: \_\_\_\_\_
- g. Graduate degree (and describe area): \_\_\_\_\_ Area: \_\_\_\_\_

63. Over the last ten years, what was your:

Occupation: \_\_\_\_\_

Employers' names and locations: \_\_\_\_\_

Spouse's Occupation: \_\_\_\_\_

Spouse's employers' names and locations: \_\_\_\_\_

Children's Occupations: \_\_\_\_\_

Children's employers' names and locations: \_\_\_\_\_

64. Have you served in the military?

☐ Yes

☐ No

65. List any clubs or associations of which you are a member:

\_\_\_\_\_  
\_\_\_\_\_

66. List any publications, print or online (including blogs) to which you subscribe, read, or contribute:

\_\_\_\_\_  
\_\_\_\_\_

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67. Are you active on any of the following social media sites? Check all that apply.

Facebook \_\_\_\_\_

X (formerly known as Twitter) \_\_\_\_\_

Instagram \_\_\_\_\_

Truth Social \_\_\_\_\_

Snapchat \_\_\_\_\_

TikTok \_\_\_\_\_

Linkedin \_\_\_\_\_

YouTube \_\_\_\_\_

68. List any newspapers and magazines that your regularly read:

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69. List any television news channels you regularly watch:

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70. List any television programs you regularly watch:

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71. List any hobbies and leisure-time activities and organizations that you participate in:

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JUROR NUMBER \_\_\_\_\_

## **CERTIFICATION**

By signing below, I hereby declare under penalty of perjury that all of the answers to the above questions are true and correct to the best of my knowledge and belief. I have not discussed my answers with others or received assistance in completing the questionnaire. I have answered all of the above questions myself.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print your full name here

\_\_\_\_\_  
Date

Juror Number: \_\_\_\_\_